

EXHIBIT 1

Production 8: Any and all records, reports, investigations, and documents of the shakedown's, searche's, and seizure's of illegal contraband confiscated from November 2011 to September 2012.

Response: After further inquiry, no documents responsive to Plaintiff's request exist. Defendant Oubre produces a copy of SOP IIB01-0010, bates stamped 108 to 112, indicating that retention of contraband logs are required to be maintained for a one-year period of time. Thus, any logs that may have been responsive to Plaintiff's request were destroyed on or before September 2013.

Production 10: Any and all documentation, and investigations of inmate assault's resulting in hospitalization from April 2011 to September 2012.

Response: Defendant Oubre supplements her previous response to include a report of inmate on inmate assaults which occurred at Baldwin State Prison between the dated of April 2011 and September 2012, bates stamped 100 to 107.

AS TO DEFENDANT CARTER

None at this time

AS TO DEFENDANT DAVIS

Production 5: Any and all reports, or documentations of inmate assaults, as to what those reports, or documentations actually mean.

Response: Defendant Davis supplements his response to include those documents contained in Defendant Oubre's response to Production 10 above.